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March 7, 2014

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VIA ECF

The Honorable Alison J. Nathan
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Room 2102
New York, NY 10007

RE: In Re M/V MSC FLAMINIA
MASTER FILE: 12 Civ. 8892 (AJN)
Our File: 200274-00003

Dear Judge Nathan:

We are attorneys for Panalpina Inc. ("Panalpina") and Panalpina World Transport Ltd. ("Panalpina World"). We write in connection with the Court's February 27, 2014, Memorandum & Order ("Order"), ordering that we submit a letter jointly with Stolt Tank Containers B.V. and Stolt-Nielsen USA Inc. (collectively "Stolt"), proposing a schedule for any third-party claims Stolt wishes to file against Panalpina. We will address the agreement reached with Stolt below.

During the week of depositions of owners and operators of the *MSC Flaminia*, the undersigned conferred with counsel for Deltech and Bulkhaul. Counsel indicated that in light of the Court's Order, Deltech and Bulkhaul are interested in filing third-party claims against Panalpina. Additional parties previously filed cross-claims against Panalpina before the Court's Order which parties may be interested in filing third-party claims against Panalpina as well.

In light of the above, and Stolt's intention to file third-party claims against Panalpina, Panalpina is amenable to providing a window of opportunity for any parties to the Limitation Proceeding to file third-party claims against it. Panalpina respectfully suggests that Stolt and any other parties with an interest in filing a third-party complaint against Panalpina do so no later than 30 days from the date the Court so-orders this letter request should the Court find it acceptable.

Counsel for Stolt joins in confirming the proposed 30 days from so-ordering schedule is suitable. Counsel for Deltech and Bulkhaul have also noted this timeline would be suitable.

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In regard to any third-party complaint filed by Stolt and/or other parties, Panalpina has agreed that the undersigned may accept service of process on behalf of the company so long as said party reciprocates by permitting service on counsel in the same manner in regard to any Panalpina claims in the above-referenced matter. Panalpina further requests the Court provide Panalpina with thirty (30) days from the last day Panalpina receives a third-party complaint to answer, otherwise move, or file its own claims.

Finally, in regard to discovery, Panalpina is participating in the discovery process and does not foresee it will require any additional time to respond to discovery requests it receives. It is amenable to following the present case management order in the Limitation Proceeding.

We thank the Court in advance for its consideration of the requests herein.

Respectfully submitted,

HOLLAND & KNIGHT LLP

By: /s/ Christopher R. Nolan

Christopher R. Nolan

cc: **By ECF Filing**
All counsel